

I. REJECTIONS UNDER 35 U.S.C. §103(a):

The Office Action has rejected claims 1, 3-5, 9-11, 13-15, 19-21, 23-25 and 29-30 under 35 U.S.C. §103(a) as being unpatentable over Lennert et al. (U.S. Patent No. 6,055,227) (hereinafter "Lennert") in view of Simonyi (U.S. Patent No. 5,911,072). The Office Action has rejected claims 2, 12 and 22 under 35 U.S.C. §103(a) as being unpatentable over Lennert in view of Simonyi and further in view of Davies (U.S. Patent No. 6,002,396). The Office Action has rejected claims 6-7, 16-17 and 26-27 under 35 U.S.C. §103(a) as being unpatentable over Lennert in view of Simonyi and further in view of Pazel (U.S. Patent No. 6,028,999). The Office Action has rejected claims 8, 18 and 28 under 35 U.S.C. §103(a) as being unpatentable over Lennert in view of Simonyi and Pazel and further in view of Davies. Applicants respectfully traverse the rejections of claims 1-30 and respectfully request that the Examiner reconsider and withdraw all outstanding rejections.

A *prima facie* showing of obviousness requires the Examiner to establish, *inter alia*, that the prior art references teach or suggest, either alone or in combination, all of the limitations of the claimed invention, and the Examiner must provide a motivation or suggestion to combine or modify the prior art reference to make the claimed inventions. See M.P.E.P. §2142. The motivation or suggestion to combine references must come from one of three possible sources: the nature of the problem to be solved, the teachings of the prior art, and the knowledge of persons of ordinary skill in the art. See *In re Rouffet*, 47 U.S.P.Q.2d 1453, 1458 (Fed. Cir. 1998). The showings must be clear and particular. See *In re Dembiczak*, 50 U.S.P.Q.2d 1614, 1617 (Fed. Cir. 1999). Broad conclusory statements regarding the teaching of multiple references, standing alone, are

not evidence. *Id.* Furthermore, the references must be considered in its entirety, i.e., as a whole, including portions that would lead away from the claimed invention. See *W.L. Gore & Associates, Inc. v. Garlock, Inc.*, 721 F.2d 1540, 220 USPQ 303 (Fed. Cir. 1983), *cert. denied*, 469 U.S. 851 (1984); M.P.E.P. § 2141.02.

In order to reject under 35 U.S.C. §103, therefore, the Examiner must provide a proper motivation for combining or modifying the references. See M.P.E.P. §2142; *In re Rouffet*, 47 U.S.P.Q.2d 1453, 1457-1458 (Fed. Cir. 1998). The Examiner recites that "it would have been obvious to one of ordinary skill in the art at the time the invention was made to apply Simonyi's teaching of displaying one of a first routine called by said routine and a second routine calling said routine in response to said collection in Lennert's system with the motivation being *to provide the user with the detail description of the routine.*" See Office Action, Page 4.

There is no motivation to combine Simonyi with Lennert as there is no suggestion or motivation in either Simonyi or Lennert to combine the teaching of a *computer program that can create new network configuration databases* as taught in Lennert with the teaching of a computer method and system that *supports extensible computational constructs for use in creating a computer program* as taught in Simonyi. Lennert teaches that "the computer program of this invention establishes a new database structure and mines source databases to load source network configuration data into the new operator services database structure. The computer program is capable of searching for the desired data and automates many of the tasks for configuring a new operator services database from the source databases. *This eliminates the current requirement for manual data entry for configuring new operator services databases for telecommunication*

switches." See Column 2, Lines 11-20. Simonyi teaches that "the system represents a computer program as an intentional program tree, which is a high-level program tree that is a syntax-independent representation using high-level computational constructs." See Abstract. Simonyi further teaches that "because the program is stored as an intentional program tree in a syntax-independent manner, the *editor allows the program to select in which of a various programming language the computer program is to be displayed.* In addition, the *system transforms an intentional program tree to a reduced program, which is a program tree comprising low-level computational constructs,* in a process called reduction. The reduction process replaces expressions of programmer's intents with a representation of one of possible multiple implementations of those intents using low-level computational constructs. See Abstract. As stated above, the Examiner stated that the motivation to combine Lennert with Simonyi was to *provide the user with the detail description of the routine.* Applicants respectfully contest the Examiner's implied assertion that Simonyi teaches providing a detailed description of a routine. Applicants respectfully request the Examiner to particularly point out the relevancy of providing a detailed description of a routine with the purpose of *eliminating the current requirement for manual data entry for configuring new operator services databases for telecommunication switches* as stated in Lennert. As interpreted by the Applicants, Lennert teaches *automating the tasks for configuring new operator services databases for telecommunication switches.* As interpreted by the Applicants, Simonyi teaches a system that allows a *program to select the programming language in which the program will be displayed.* Furthermore, as interpreted by the Applicants, Simonyi teaches that the system may *transform a high-level program tree to a low-level program tree comprising low-level computational constructs.* Therefore, there is no motivation to combine Simonyi with Lennert as there is no suggestion or motivation in either Simonyi

or Lennert to combine the teaching of a *computer program that can create new network configuration databases* as taught in Lennert with the teaching of a computer method and system that *supports extensible computational constructs for use in creating a computer program* as taught in Simonyi.

Furthermore, the Examiner recites that "it would have been obvious to one of ordinary skill in the art at the time the invention was made to apply Davis's teaching of first window region comprises a calls window region and a second window region comprises a called-by window region in Lennert's system with the *motivation to provide a convenient graphical representation of the called-by routine.*" See Office Action, Page 5. Furthermore, the Examiner recites that "it would have been obvious to one of ordinary skill in the art at the time the invention was made to apply Davis's teaching of the step of displaying said one of said first and second routines further comprises the step of displaying said second routine in response to a routine called field of said entry in Lennert's system with the motivation *being to accurately and efficiently display the routine.* See Office Action, Page 7.

There is no motivation to combine Davis with Lennert as there is no suggestion or motivation in either Davis or Lennert to combine the teaching of a *computer program that can create new network configuration databases* as taught in Lennert with the teaching of *creating a process structure for performing a task* as taught in Davis. Lennert teaches that "the computer program of this invention establishes a new database structure and mines source databases to load source network configuration data into the new operator services database structure. The computer program is capable of searching for the desired data and automates many of the tasks for configuring a new operator

services database from the source databases. *This eliminates the current requirement for manual data entry for configuring new operator services databases for telecommunication switches.*" See Column 2, Lines 11-20. Davis teaches that "a task could usefully use a tool that would assist him or her in taking a logical course through the identification and definition of the steps themselves necessary in performing a particular task." See Column 1, Lines 44-47. Davis further teaches "a system and method for defining a process structure for performing a task." See Abstract. As stated above, the Examiner stated that the motivation to combine Lennert with Davis was to *provide a convenient graphical representation of the called-by routine*. Applicants respectfully contest the Examiner's implied assertion that Davis teaches providing a graphical representation of the called-by routine. Furthermore, Applicants respectfully request the Examiner to particularly point out the relevancy of providing a convenient graphical representation of the called-by routine with the purpose of *eliminating the current requirement for manual data entry for configuring new operator services databases for telecommunication switches* as stated in Lennert. As stated above, the Examiner stated that the motivation to combine Lennert with Davis was to *accurately and efficiently display the routine*. Applicants respectfully contest the Examiner's implied assertion that Davis teaches displaying a routine. Furthermore, Applicants respectfully request the Examiner to particularly point out the relevancy of accurately and efficiently displaying a routine with the purpose of *eliminating the current requirement for manual data entry for configuring new operator services databases for telecommunication switches* as stated in Lennert. As interpreted by the Applicants, Lennert teaches automating the tasks for configuring new operator services databases for telecommunication switches. As interpreted by the Applicants, Davis teaches a system that *allows a user to identify the steps necessary in performing a particular task*

as well as tracking the progress of the particular task and its constituent steps. Therefore, there is no motivation to combine Davis with Lennert as there is no suggestion or motivation in either Davis or Lennert to combine the teaching of a *computer program that can create new network configuration databases* as taught in Lennert with the teaching of *creating a process structure for performing a task* as taught in Davis.

Furthermore, the Examiner recites that "it would have been obvious to one of ordinary skill in the art at the time the invention was made to apply Pazel's teaching of accessing a data structure stored in a database in Lennert's system with the *motivation being to conveniently identify routines*" See Office Action, Page 6. Furthermore, the Examiner recites that "it would have been obvious to one of ordinary skill in the art at the time the invention was made to apply Pazel's teaching of displaying said one of said first and second routines further comprises the step of displaying said first routine in response to said routine identifier in a routine field of said entry in Lennert's system with the *motivation being to conveniently identify routines*" See Office Action, Page 7.

There is no motivation to combine Pazel with Lennert as there is no suggestion or motivation in either Pazel or Lennert to combine the teaching of a *computer program that can create new network configuration databases* as taught in Lennert with the teaching of a *program error detection tool* as taught in Pazel. Lennert teaches that "the computer program of this invention establishes a new database structure and mines source databases to load source network configuration data into the new operator services database structure. The computer program is capable of searching for the desired data and automates many of the tasks for configuring a new operator services database from the source databases. *This eliminates the current requirement for manual data entry for*

configuring new operator services databases for telecommunication switches." See Column 2, Lines 11-20. Pazel teaches "a system and method for *constructing a program error detection tool* herein referred to as a 'virtual debugger.' The virtual debugger aids in alleviating many of the foregoing problems by *allowing testing of complex program units to be conducted prior to component or integration testing, and even prior to the component development completion.* This is achieved through 'non-sequential program statement execution' in an incompletely assembled program runtime environment." See Column 2, Lines 13-21. As stated above, the Examiner stated that the motivation to combine Lennert with Pazel was to *conveniently identify routines.* Applicants respectfully contest the Examiner's implied assertion that Pazel teaches a system or method that conveniently identifies routines. Furthermore, Applicants respectfully request the Examiner to particularly point out the relevancy of conveniently identifying routines with the purpose of *eliminating the current requirement for manual data entry for configuring new operator services databases for telecommunication switches* as stated in Lennert. As interpreted by the Applicants, Lennert *teaches automating the tasks for configuring new operator services databases for telecommunication switches.* As interpreted by the Applicants, Pazel teaches an error detection tool. Therefore, there is no motivation to combine Pazel with Lennert as there is no suggestion or motivation in either Pazel or Lennert to combine the teaching of a *computer program that can create new network configuration databases* as taught in Lennert with the teaching of a *program error detection tool* as taught in Pazel.

Lennert and Simonyi, taken singly or in combination, do not teach or suggest "*selecting a routine from a routine list displayed in one of a first and a second window region*" as recited in claim 1 and similarly in claims 11 and 21. Instead, Lennert teaches

a "browse feature 124" that *"allows the user to select the environment 132, then calls the display equipment (dis_eq) routine 134, the display packs (disp_paks) routine 136, the display features (disp_feat) routine 138, the display equipment number (disp_ens) routine 140, and the display the test user guide (disp_tug) routine 142."* See Column 7, Lines 34-40. As interpreted by the Applicants, Lennert allows the user to *select the environment which calls various routines*. Lennert and Simonyi, taken singly or in combination, do not teach or suggest *selecting a routine from a routine list*. Neither does Lennert and Simonyi, taken singly or in combination, teach or suggest *"selecting a routine a routine list displayed in one of a first and a second window region."*

Lennert and Simonyi, taken singly or in combination, do not teach or suggest *"displaying one of a first routine called by said routine and a second routine calling said routine in response to said selection"* as recited in claim 1 and similarly in claims 11 and 21. Simonyi teaches that *"the routine creates a data structure called a display list. After the routine completely expands the display list, the routine uses it to display the representation. The display list is a linked list that contains display list items, each of which can either be unexpanded or expanded."* See Column 23, Lines 11-15. Simonyi further teaches that *"expanded display list items, on the other hand, correspond to one of one or more pieces of the display representation details associated of the type of a particular node of the subtree."* See Column 23, Lines 19-22. Simonyi further teaches that *"the routine replaces the unexpanded display list with a replacement set of display list items specified by the selected representation format. Some of the display list items may be expanded and correspond to the actual display representation, while others may be unexpanded and correspond to nodes of the subtree that are children of the node to which the replaced display list entry corresponds."* See Column 23, Lines 30-38. As

interpreted by the Applicants, Simonyi simply teaches items that may be expanded or unexpanded. However, Lennert and Simonyi, taken singly or in combination, do not teach or suggest *displaying one of a first routine called by said routine*. Applicants respectfully request the Examiner to particularly point out in Lennert or Simonyi the teaching of displaying a routine called by a particular routine. Furthermore, Lennert and Simonyi, taken singly or in combination, do not teach or suggest *displaying a second routine calling said routine in response to said selection*. Applicants respectfully request the Examiner to particularly point out in Lennert or Simonyi the teaching of displaying a routine that called the particular routine.

For at least the above reasons, claims 1, 11 and 21 are patentable over Lennert in view of Simonyi in further view of Davies and Pazel. Claims 2-10, 12-20 and 22-30 each recite combinations of features including the above combinations, and thus are patentable for at least the above reasons as well. Claims 2-10, 12-20 and 22-30 recite additional features which, in combination with the features of the claims upon which they depend, are patentable over Lennert in view of Simonyi in further view of Davies and Pazel.

For example, Lennert, Simonyi, Davies and Pazel, taken singly or in combination, do not teach or suggest "wherein said *first window region comprises a calls window region* and said *second window region comprises a called-by window region*" as recited in claim 2 and similarly in claims 12 and 22. The Office Action directs Applicants attention to Figure 5 in Davis as teaching a first window comprising a calls window region and a second window region comprising a called-by window region. See Office Action, Page 5. Applicants respectfully contest the Office Action's assertion that Figure

5 in Davis teaches a first window comprising a calls window region and a second window region comprising a called-by window region. As interpreted by the Applicants, *Figure 5 in Davis teaches a display screen of a detail of a refined task step.* As interpreted by the Applicants, Figure 5 in Davis does not teach a window region comprising a *calls window region* or a *called-by window region*. As interpreted by the Applicants, Figure 5 in *Davis simply teaches displaying steps to perform a task.* Applicants kindly request the Examiner to particularly point out where Lennert or Davis teach a window comprising a *calls window region* or a window comprising a *called-by window region*. Lennert, Simonyi, Davies and Pazel, taken singly or in combination, do not teach or suggest *a first window region that comprises a calls window region.* Lennert, Simonyi, Davies and Pazel, taken singly or in combination, do not teach or suggest *a second window region that comprises a called-by window region.*

Lennert, Simonyi, Davies and Pazel, taken singly or in combination, do not teach or suggest "said routine list is contained in a *plurality of data structures stored in a database*" as recited in claim 3 and similarly in claims 13 and 23. Simonyi teaches that "the routine creates a data structure called a display list. After the routine completely expands the display list, the routine uses it to display the representation. The display list is a linked list that contains display list items, each of which can either be unexpanded or expanded." See Column 23, Lines 11-15. As interpreted by the Applicants, Simonyi teaches creating a data structure that may be used to display a display representation for the nodes in an IP tree. As interpreted by the Applicants, Simonyi teaches a data structure that is a display list. Accordingly, the *display list is not a routine list contained in a plurality of data structures.* Furthermore, Lennert, Simonyi, Davies and Pazel, taken

singly or in combination, do not teach or suggest that the plurality of data structures are *stored in a database*.

Lennert, Simonyi, Davies and Pazel, taken singly or in combination, do not teach or suggest "said step of displaying one of said first routine and said second routine further comprises the step of *displaying said one of said first and second routines in a tree hierarchy*" as recited in claim 4 and similarly in claims 14 and 24. Simonyi teaches that "FIGS. 11A-11D are sample diagrams *showing the contents of a subtree* and the *display representation* at various times during the insertion of two new nodes into the subtree. FIG. 11A is a sample diagram *showing the contents of the subtree* and the *display representation* before any insertion has been performed." See Column 23, Lines 42-47. Simonyi further teaches that "the *display representation 1120 contains a line of text 1121 corresponding to the subtree*. An insertion point left selection 1122 is shown as a vertical bar cursor positioned at the beginning of the line and an underscored indicating the extent of the selection. The programmer then moves the insertion point to between the characters "A" and "," in the display representation. The programmer moves the insertion point by either pointing to the new position with a pointing device, using cursor positioning keys to move the cursor to the new position, or using a move to child positioning command." See Column 23, Lines 56-66. As interpreted by the Applicants, Simonyi teaches *displaying the contents of the subtree in a display representation that is not a tree hierarchy* where the subtree comprises parent and child nodes. Lennert, Simonyi, Davies and Pazel, taken singly or in combination, do not teach or suggest *displaying said one of said first and second routines in a tree hierarchy*.

Lennert, Simonyi, Davies and Pazel, taken singly or in combination, do not teach or suggest "said step of selecting said routine from a routine list comprises the step of *selecting an icon associated with said routine*, wherein said *icon flags said routine as having an undisplayed routine dependency*" as recited in claim 5 and similarly in claims 15 and 25. Instead, Simonyi teaches that "the routine creates a data structure called a display list. After the routine completely expands the display list, the routine uses it to display the representation. The display list is a linked list that contains *display list items*, each of which can either be *unexpanded or expanded*." See Column 23, Lines 11-15. As interpreted by the Applicants, Simonyi simply teaches *items that may be expanded or unexpanded*. Applicants respectfully request the Examiner to particularly point out where Simonyi teaches an *icon* where the *icon is associated with a routine*. Applicants have performed a word search of "*icon*" and was not able to locate the word "*icon*" or derivations of it. Applicants kindly request the Examiner to particularly point out in Simonyi where an *icon* is taught. Lennert, Simonyi, Davies and Pazel, taken singly or in combination, do not teach or suggest *selecting an icon associated with said routine*. Furthermore, Lennert, Simonyi, Davies and Pazel, taken singly or in combination, do not teach or suggest an *icon that flags a routine as having an undisplayed routine dependency*.

Lennert, Simonyi, Davies and Pazel, taken singly or in combination, do not teach or suggest "said step of accessing a data structure stored in a database, said data structure having an entry corresponding to said routine, and wherein said step of *displaying* said one of said first and second routines comprises the step of displaying said one of said first and second routines in *response to a routine identifier*, corresponding to said one of said first and second routines, contained in a portion of said entry" as recited in claim 6

and similarly in claims 16 and 26. Instead, Pazel teaches a "global data dictionary 13" that "provides information about the structure and location of program routines and application-wide program definitions." See Column 4, Lines 58-60. Pazel further teaches a "*global routine list 16*" that "provides a *list of global routine items 17*, each containing details about each routine in the application. *Each global routine item preferably contains* the routine's name 18, a *unique reference identifier 19*, and the routine's location 20 within the program content." See Column 6, Lines 6-11. As interpreted by the Applicants, Pazel teaches a list comprising routine items where each routine item may comprise a *reference identifier*. As interpreted by the Applicants, Pazel does not teach *displaying* said one of said first and second routines *in response to a routine identifier* but simply teaches storing a reference identifier associated with a particular routine item. Lennert, Simonyi, Davies and Pazel, taken singly or in combination, do not teach or suggest *displaying* said one of said first and second routines comprises the step of displaying said one of said first and second routines *in response to a routine identifier*.

Lennert, Simonyi, Davies and Pazel, taken singly or in combination, do not teach or suggest "*displaying said first routine in response to said routine identifier in a routine field of said entry*" as recited in claim 7 and similarly in claims 17 and 27. Instead, Pazel teaches a "global data dictionary 13" that "provides information about the structure and location of program routines and application-wide program definitions." See Column 4, Lines 58-60. Pazel further teaches a "*global routine list 16*" that "provides a *list of global routine items 17*, each containing details about each routine in the application. *Each global routine item preferably contains* the routine's name 18, a *unique reference identifier 19*, and the routine's location 20 within the program content." See Column 6,

Lines 6-11. As interpreted by the Applicants, Pazel teaches a list comprising routine items where each routine item may comprise a *reference identifier*. As interpreted by the Applicants, Pazel does not teach *displaying a routine in response to a routine identifier in a routine field of the entry*. Lennert, Simonyi, Davies and Pazel, taken singly or in combination, do not teach or suggest *displaying a routine in response to a routine identifier in a routine field of the entry*.

Lennert, Simonyi, Davies and Pazel, taken singly or in combination, do not teach or suggest "*displaying said second routine in response to said routine identifier in a routine called field of said entry*" as recited in claim 8 and similarly in claims 18 and 28. The Office Action directs Applicants attention to the last three routines in Figure 5 in Davis as teaching displaying the second routine in response to the routine identifier in a routine called field of the entry. See Office Action, Page 7. Applicants respectfully contest the Office Action's assertion that Figure 5 in Davis teaches displaying the second routine in response to the routine identifier in a routine called field of the entry. As interpreted by the Applicants, *the last three entries in Figure 5 in Davis are steps to accomplish a particular task*. As interpreted by the Applicants, Figure 5 in Davis does not teach *displaying a routine in response to a routine identifier in a routine called field of the entry*. Lennert, Simonyi, Davies and Pazel, taken singly or in combination, do not teach or suggest *displaying a routine in response to a routine identifier in a routine called field of the entry*.

Lennert, Simonyi, Davies and Pazel, taken singly or in combination, do not teach or suggest "the step of *specifying a routine type*, and wherein said step of displaying said one of said first and second routines comprises the step of displaying said one of said

first and second routines *in response to said routine type*" as recited in claim 9 and similarly in claims 19 and 29. Instead, Lennert teaches a "browse feature 124" that "*allows the user to select the environment 132, then calls the display equipment (dis_eq) routine 134, the display packs (disp_paks) routine 136, the display features (disp_feat) routine 138, the display equipment number (disp_ens) routine 140, and the display the test user guide (disp_tug) routine 142.*" See Column 7, Lines 34-40. As interpreted by the Applicants, Lennert allows the user to *select the environment which calls various routines*. Applicants respectfully request the Examiner to particularly point out where Lennert teaches specifying a *routine type*. Applicants have performed a phrase search of "*routine type*" and was not locate the phrase "*routine type*" or derivations of it. Applicants kindly request the Examiner to particularly point out in Lennert where a *routine type* is taught. Lennert, Simonyi, Davies and Pazel, taken singly or in combination, do not teach or suggest *specifying a routine type*. Furthermore, Lennert, Simonyi, Davies and Pazel, taken singly or in combination, do not teach or suggest displaying said one of said first and second routines *in response to said routine type*.

Lennert, Simonyi, Davies and Pazel, taken singly or in combination, do not teach or suggest "the step of *displaying said routine list in said first and second window regions*" as recited in claim 10 and similarly in claims 20 and 30. The Office Action directs Applicants attention to Figure 6 in Lennert and Figure 11 in Simonyi as teaching a first and second window region. See Office Action, Page 4. Applicants respectfully contest the Office Action's assertion that Figure 6 in Lennert and Figure 11 in Simonyi teach a first and second window region. As interpreted by the Applicants, *Figure 6 in Lennert teaches a flowchart of the browse feature of a computer program*. As interpreted by the Applicants, *Figure 11 in Simonyi teaches diagrams showing the*

contents of a subtree and the display representation at various times during the insertion of two new nodes into the subtree. Applicants kindly request the Examiner to particularly point out where Lennert or Simonyi teach window regions. Lennert, Simonyi, Davies and Pazel, taken singly or in combination, do not teach or suggest displaying the routine list in the *first and second window regions*.

As a result of the foregoing, Applicants respectfully assert that the Examiner's prima facie case of obviousness is not taught or suggested by the cited prior art since there are numerous claim limitations, and thus one skilled in the art would not have been able to create the claimed invention in view of the cited prior art.

II. REJECTIONS UNDER 35 U.S.C. §101:

The Office Action has rejected claims 21-30 under 35 U.S.C. §101 because the claimed invention is directed to non-statutory subject matter. Applicants respectfully contest that claims 21-30 are directed to non-statutory subject matter. However, Applicants have amended the preamble of claim 21 to further prosecution. Applicants note that the amendment to the preamble of claim 21 was not to overcome prior art. Furthermore, Applicants note that the amendment to claim 21 is not narrowing in scope and therefore no prosecution history estoppel arises from the amendment to claims 21. *See Festo Corp. v. Shoketsu Kinzoku Kogyo Kabushiki Co.*, 56 USPQ2d 1865, 1870 (Fed. Cir. 2000). Accordingly, Applicants submit that claims 21-30 are directed to statutory subject matter

III. DRAWING OBJECTIONS:

The Office Action has objected to the drawings under 37 C.F.R. §§1.84(p)(4) and 1.84(p)(5). Applicants have amended the specification and Figure 2 and believe these amendments address the objections. The amendment conforms the specification to the drawing and Applicants' respectfully assert that no new matter has been added.

IV. SPECIFICATION OBJECTION:

The Office Action has objected to the specification because it did not contain the serial number of the related invention entitled "Apparatus for Cross Referencing Routines and Method Therefor." Applicants have amended the specification to include the serial number of the related invention entitled "Apparatus for Cross Referencing Routines and Method Therefor" and believes the amendment addresses the objection.

V. CONCLUSION

As a result of the foregoing, it is asserted by Applicants that the remaining Claims in the Application are in condition for allowance, and respectfully request an early allowance of such Claims.

Applicants respectfully request that the Examiner call Applicants' attorney at the below listed number if the Examiner believes that such a discussion would be helpful in resolving any remaining problems.

Respectfully submitted,

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